

## **Exhibit K**

**Sean Joseph McQuade**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOANNE T. ALCABES, et al,

Plaintiffs,

**AFFIDAVIT OF**  
**SEAN JOSEPH McQUADE**

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF ALABAMA     )  
                              : SS.:  
COUNTY OF MOBILE    )

SEAN JOSEPH McQUADE, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 201 Bayou Avenue, Saraland, AL 36571.
2. I am currently 28 years old, having been born on May 19, 1993.
3. I am the son of Kevin Patrick McQuade, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from esophageal cancer on August 25, 2011, at the age of 56. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I was only 18 years old at the time of my father's death.

6. My dad and I were close for his whole life. I looked up to my dad, who worked incredibly hard to provide for our family and send us to private school. Despite how much he worked, he was a very present father. He coached baseball and basketball and attended all of our school events. He was also very active in our church, and was a member of the Knights of Columbus. Our family was inseparable.

7. Even though I was only 8 years old at the time of 9/11, I remember that day so clearly. I lived in New York at the time, and I remember the putrid smell in the air. I remember my dad coming home from long work shifts on the Staten Island Ferry with his paper mask that everyone knew wasn't really doing anything to protect him. My dad would come home from work, sleep for a few hours, and then head back to work since the first responders needed him. For the first few weeks after 9/11, he would often come home covered in dust. He worked really hard to provide for us and give us a better life. He never complained and always did what was necessary for his family. I am proud of the man that he was and how he raised me to be a selfless person.

8. Because I was so young when my father became ill, I was frightened to learn about his diagnosis. I didn't want to lose him. I needed my dad. As his illness progressed, it was heartbreaking to watch my father get sick with esophageal cancer that later metastasized. I saw him struggle to swallow and have difficulty eating. I knew it wasn't good.

9. My father's cancer turned my family's whole world upside down. We lost our home and had to move to Florida. I had to leave my friends and adjust to a new school. I felt uprooted and struggled with anxiety and depression. I felt like we lost our foundation when my father could no longer work and we couldn't make ends meet. I was aware that we could only afford to live in Florida due to the generosity of my mother's sister. I knew that I was only in



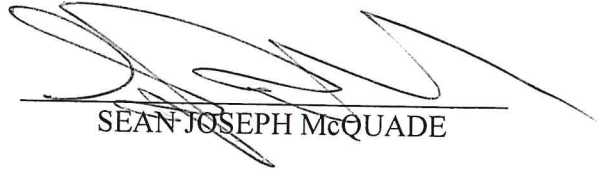
private school because the school gave my parents a discount due to our situation.

10. I felt lost as a result of my father's illness and death during a very formative time in my life. I struggled through the remainder of high school. I started college two weeks after my father's death. I got terrible grades. I never finished college. Even now, so many years later, I am working to try to finish my Bachelor's degree. I have had to make peace with the fact that I may never be able to go to medical school due to my bad grades – another dream that is never going to be fulfilled. I continue to suffer from anxiety and depression. I go to therapy and have been medicated on and off for years. I believe my lingering emotional issues contributed to the failure of my first marriage. My mental health has never been great because of what happened to my dad.

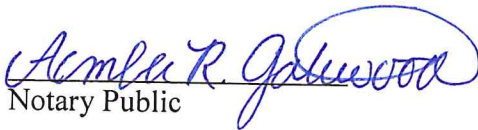
11. I miss my dad every day. I wish he was still with us. I wish he could have seen me graduate from high school. I wish he could have seen my brother graduate from college since he was the first person on either side of our family to accomplish that. I wish he could have met his grandson, who has so many questions and asks about him a lot. I wish he could know that I tell my son about him all the time and even took him to the World Trade Center site and explained to him the events of that day and how it took his grandfather. I wish he could see that I followed in his footsteps by helping people working as a paramedic supervisor. I wish he could know how much he inspired me to go into a profession to take care of people. I wish he could know that his selfless work following 9/11 was not in vain, and that I have remained informed on terrorism response through FEMA because of what happened to him. I wish he could know that if anything like 9/11 ever happens again, I will be there giving back. He would be so proud.

12. It was heartbreaking to see my dad, my hero, be diagnosed with cancer and decline so rapidly. In his final weeks, I asked my dad if he would have responded the same way

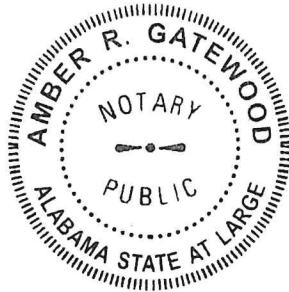
after the 9/11 attacks had he known what would happen to him in the future. He told me that he absolutely would because people needed help. That was the kind of person he was – no one loved his family, country and city more than my dad. It was very hard to lose him at 18 years old, but he taught me so much about love, life and responsibility in such a short period of time. I'm very proud to be his son.

  
SEAN JOSEPH McQUADE

Sworn to before me this  
8<sup>th</sup> day of June 2022

  
Notary Public

MY COMMISSION EXPIRES DECEMBER 19, 2023



**Frederick M. McQuillan**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
FREDERICK M. McQUILLAN**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF DUTCHES    )

FREDERICK M. MCQUILLAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 163 Smith Road, Poughkeepsie, New York 12603.

2. I am currently 47 years old, having been born on December 2, 1974.

3. I am the son of Patrick Joseph McQuillan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from COPD on March 24, 2014, at the age of 57. It was medically determined that my father's illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was a very involved parent, and we did lots of things together. As I was growing up, my dad would coach my little league team and, in later years, we would go fishing together on a regular basis. As an adult, we would ride motorcycles together. After spending a few years in Arizona, I returned to New York and had some time to be nearby my dad once again. At that point, I was married with a family of my own. Everybody got along well, and as a result we shared many happy occasions as a family and tried to have dinner together on a

weekly basis. In the years before he became ill, during the spring and summer months, my dad and I would go fishing, camping, and motorcycling. Generally, we tried to be outdoors as much as possible. When my daughter, Jordan, was born, my father took great pride in becoming a grandfather, and the two of them became extremely close. At that point, after September 11, 2001, Jordan spent most of the time with my father, perhaps even more than I did. Around the time of 9/11, we were living in the village of Ossining and my parents were living in Putnam Valley, not too far apart. My father loved Jordan to no end. She was only 13 years old when he passed away.

6. My father worked as a nurse at a New York State correctional facility. In addition, he was also a volunteer fireman and also volunteered for the ambulance corps. Immediately after the attacks on September 11, 2001, my dad went to lower Manhattan in a voluntary capacity. He grabbed his turnout gear from the fire department and went down to the city. Then, he later explained that he did whatever he could as far as recovery efforts, including participating on a line of volunteers sorting body parts that would later be used to assist in identifying victims. That's the biggest thing that stands out, and he did that for about a week. As a result of the stressful nature of that situation, my dad suffered a heart attack while driving down the Taconic Parkway on the way to Ground Zero. After pulling over to the side of the highway, my dad drove himself to the hospital where he received further medical attention. In addition to the heart attack, my dad injured himself while digging through the pile of rubble, causing a gash on his leg. All of these events are well documented in father's journal. My father returned to Ground Zero a few times more later in the year, as well as for memorial ceremonies.

7. My dad and I were in constant contact with each other, so I knew he was having a number of respiratory issues and that his health was starting to decline. My dad was also very depressed. He didn't want to share much about it and held a lot of that inside. My whole family could visibly see a decline in his health and understood that he was going to doctors on a regular basis. There's no doubt in my mind that 9/11 had an immediate impact on my dad's mental health; after all, within just a few days he suffered a heart attack. The physical impact, as well as the breathing issues, developed more gradually, within one year or so. A year after the terrorist attacks, my father had a much harder time moving around due to circulation problems in his legs. I would estimate that my dad slowed down by approximately 50% after 9/11.



8. While the mental impact of 9/11 was immediate to my father, his breathing issues worsened more gradually. His breathing became so labored that he just didn't want to do too much. That was the most profound effect. As the respiratory issues developed, my dad was prescribed a CPAP machine for sleep apnea and also had to use inhalers and several other medications. My dad couldn't sleep normally; he had to sleep sitting up, and couldn't get a good rest. Within a few years, more severe breathing issues started to surface. As time went on, my dad had decreased mobility and movement because breathing was such a struggle. Every night, he had to use his CPAP machine, and at times he would cough so hard that it would scare me half to death. It was terrifying. In addition, his legs would have so much fluid and swelling, they would literally leak, which was very disturbing. Before my mom passed away in 2018, she did her best to care for my dad in a number of ways, including bandaging his legs, draining fluid from his legs, administering his medications, taking him to doctors, and cooking and cleaning. Both my parents were in the nursing field and their primary interest was in helping people and caring for others.

9. My daughter, Jordan, was the love of her grandfather's life and vice versa. She spent a lot of time with her grandparents, and they wanted to be with her as much as possible. I know she's still hurting from the loss of my father, which, of course, makes me hurt for her. She was the closest to him. My wife, Stephanie, misses him too. They were buddies and got along famously. My dad always made everybody smile. He lit up the room just by stepping in.

10. There was some economic impact from my father's condition and his passing. After my father passed away, my mother was stuck with a house that was over mortgaged. She ended up leaving it to the bank and moved in with us. She stayed with us until she passed away. From that perspective, my mother had to leave the house that she had with her husband. The reality is that it was hard for her to cover the bills on her social security and limited income, especially considering that my dad wasn't able to work for about three years before he died.

11. The biggest impact from my dad's illness was on my daughter because she saw her grandparents constantly. I was there with them almost every weekend. I remember seeing my dad trying to sleep, but he couldn't and had to sleep upright. Unfortunately, there were lots of activities that Jordan and my dad couldn't do together anymore. As for myself, I had my time with him as a youngster, but my daughter didn't get the chance to have her grandfather at her

high school graduation, and he won't be there to share in all her future accomplishments. In the years that followed my dad's passing, Jordan developed a lot of anxiety issues with which she is still grappling in therapy and had to be in a mental hospital for a short time. I know if my dad were still here, things might have been very different for her. It's sad for me to see my daughter's pain that resulted from her grandfather's death.

  
FREDERICK M. MCQUILLAN

Sworn to before me this  
8 day of April, 2022

  
Notary Public

PATRICIA KALBA  
Notary Public, State of New York  
No. 01KA6080158  
Qualified in Westchester County  
My Commission Expires Sept. 9, 2022

**Elaine Miller**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
ELAINE MILLER**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF HUDSON )

ELAINE MILLER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 415 Cator Avenue, Jersey City, New Jersey 07305.

2. I am currently 59 years old, having been born on January 30, 1963.

3. I am the wife of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from penile cancer on September 4, 2017, at the age of 63. It was determined by the World Trade Center Health Program that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Trevor was a loving husband, and we had built a wonderful life together. Trevor enjoyed many outdoor activities, even chores, including mowing the lawn. As a couple, we traveled frequently together, including trips to the Caribbean, where Trevor could enjoy an active lifestyle, including jet skiing, swimming, and other sports.

6. On September 11, 2001, Trevor and I both worked in Manhattan's financial district. Trevor was at One New York Plaza, and I worked at 390 Greenwich Street, only a few blocks away. On the day of the terrorist attacks, Trevor was told to leave the building and we

didn't see each other until much later in the evening. Once the public was informed that it was safe to return, Trevor returned to work within approximately three weeks after the attack.

7. I first discovered that Trevor had a serious medical condition in 2015, after finding blood when I was changing our bed sheets. Trevor went to the doctor and had a biopsy, which led to him being diagnosed with penile cancer. My husband was a proud man; however, his diagnosis left him feeling embarrassed and that his manhood was lost.

8. Trevor's cancer had a profound impact on my daily life and emotional health. In fact, I am still on antidepressants, two different ones, and still don't sleep at night. While I tried to be the strong wife and give Trevor as much dignity as possible, protecting his privacy became increasingly difficult as his illness progressed. A once strong and burly man now needed help just to clean himself. Because the cancer was on his private parts, I helped the nurses in the hospital.

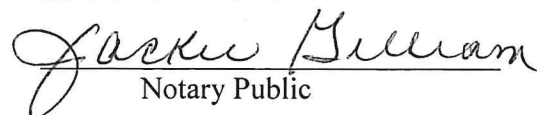
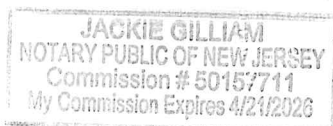
9. Since the time of the biopsy, Trevor was no longer able to work. I became the sole breadwinner. I not only had to go to work every day, but had to take care of my husband as well. With the health insurance provided through my work, we connected with a doctor who assisted Trevor in participating in a clinical trial in Birmingham, Alabama. However, traveling by plane was impossible because the flight would have been too uncomfortable for Trevor. As a result of the cancer treatment, Trevor had lymphedema, which caused his scrotum to swell up to the size of a basketball. Ultimately, we moved Trevor's care to his mother's house in Florida, where we could more easily drive to Birmingham as needed.

10. My husband's cancer and death has had an overwhelming impact on me and our entire family. As his wife, I know we did everything we could and followed all the doctors' recommendations to the letter regarding Trevor's treatment. The Court should know that, in his final days, Trevor said to me that "I can literally feel the cancer eating me up," and he suffered tremendously. I was devastated that I couldn't do more for him during his illness and final days. It has weighed on me every day since his death.



ELAINE MILLER

Sworn to before me this  
5<sup>th</sup> day of April, 2022

  
Notary Public

**Sean Miller**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
SEAN MILLER**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF NEW YORK    )

SEAN MILLER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 275 South Street, Apt 12L, New York, New York 10002.

2. I am currently 38 years old, having been born on July 13, 1983.

3. I am the son of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from penile cancer on September 4, 2017. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Trevor was an amazing father to me and was always heavily involved in my life. I often spoke with my dad for fatherly advice as I was growing up; and as I grew in my career, I sought his advice about professional situations in the corporate world. He was always an incredible source of support and encouragement to me. Growing up, my father was always present at all family gatherings where we would frequently celebrate with food, catch up, hug, and watch sports. Some of my fondest memories of spending time with my father was visiting a



resort in Jamaica, where he was married, and another trip to a resort in the Dominican Republic. Those trips have a lot of sentimental value, which I wouldn't trade for anything due to all of the father-son bonding moments.

6. On September 11, 2001, I was 18 years old. I still have vivid memories of my father describing his experience working near the World Trade Center that day because I actually lived in that area at the time. Before 9/11, I had visited my dad at his office multiple times. My dad had to evacuate his office on the day of the attacks but returned to work at the same location a few weeks later after the authorities advised, wrongly so, that it was safe to return.

7. On 9/11, my father and I both worked in lower Manhattan's financial district. He was at One New York Plaza, and I worked at 390 Greenwich Street, only a few blocks away. On the day of the terrorist attacks, my father was told to leave the building and we didn't see each other until much later in the evening. We were so relieved to see each other.

8. I was in my early 30s when I first learned that my father was ill. He told me about his diagnosis over the phone, and told me not to worry too much because the doctor said it was treatable. My dad put on a brave face, and I tried to be as optimistic as possible, hoping for the best and that his condition would improve.


9. I was constantly concerned for him and how quickly things progressed. Following a course of treatment, my dad went in for surgery, and we were told that the cancer was undetectable. That was such a relief. Unfortunately, the cancer returned not long after. My whole family was subjected to an emotional roller coaster as my father's condition worsened.

10. On a personal level, I was impacted financially after my father became sick because I took off time from work to help with father's care and be with him and our family in Florida. Of course, just the fact that my father's illness had stripped him of his ability to work had a great effect on the entire family.

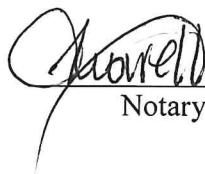
11. My father's cancer had a profound impact on my daily life and emotional health. I felt terrible to see my father, a very prideful person, have his dignity ripped away from him as the cancer made everyday functions and mobility impossible. In addition, since I was planning my wedding at the time of my dad's illness, my family and I were hopeful that he could attend. However, as my father's mobility declined, we were planning to livestream the ceremony to

him. Sadly, my dad passed away only three days before the wedding. Shortly before his death my father imparted wise words, reminding me that "life is for the living." As a result, I did not attend his funeral because my father would have wanted me to move forward in my life because every day is not guaranteed.

12. I believe that so many families in the 9/11 community that experienced a loss from a latent injury, like my father's cancer, remain in so much pain. I have no doubt that my father's death was a result of actions of the terrorists on 9/11, and emphatically believe that those responsible should be held accountable.

  
SEAN MILLER

Sworn to before me this  
11 day of April, 2022

  
Notary Public

JACQUELINE WORRELL  
Notary Public, State Of New York  
NO: 01WO6136888  
Qualified In Kings County  
Commission Expires November 14, 2025

**Ras Yoseff Makonnen**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
RAS YOSEFF MAKONNEN**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA                     )  
  : SS.:  
COUNTY OF PALM BEACH             )

RAS YOSEFF MAKONNEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 138 West 18<sup>th</sup> Street, Apt. A, Rivera Beach, Florida 33404.

2. I am currently 70 years old, having been born on February 7, 1952.

3. I am the older brother of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Trevor passed away from penile cancer on September 4, 2017. It was determined by the World Trade Center Health Program that his cancer was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Trevor and I grew up together in Jamaica and immigrated to the United States in 1969. Although we lived in different states, whenever he came to Florida I was the first person he would visit. We had an amazing comradery. When we weren't together, we spoke often and enjoyed catching up. I miss him, I truly do. I miss his voice.

6. Trevor worked as a financial advisor in the financial district in lower Manhattan. There's no question that, due to his continued to work in that area, he breathed in asbestos,



burned bodies and materials, and other toxins for several months after the attack.

7. For the most part, Trevor shielded us from the extent of his illness. In fact, I really didn't know how bad his cancer was until it was already in its final stages.

8. I was devastated by Trevor's cancer and death. We all were, especially my mother. In the same month that Trevor died, we also lost my stepfather, David Price, a Vietnam veteran who received a military funeral. The combined impact of the loss of these two great men that I loved made the entire situation even more devastating. It was one of the worst times of my life. I was truly saddened to learn more and more about Trevor's illness. It just made me think of our childhood in Jamaica and later in New York. Both Trevor and I graduated from William Howard Taft High School in the Bronx. In fact, we both made the yearbook in 1972 with Trevor being voted "Most Handsome," and me "Mr. Personality."

9. We are a close-knit family. I have five sons and four daughters of my own. I also feel the impact of Trevor's loss for them because he was a beloved uncle to all of his nieces and nephews.

10. Trevor was more than a brother. He was a loyal friend, and we would help each other out through thick and thin. If I ever had a problem, I could call on my brother and he would take care of whatever I needed. And when he visited Florida, he would automatically just put something in my hands. We loved each other. I never had to ask him for help. He just knew and would always say, "Here, my brother."

11. My family and I are devastated by the loss of my brother. Nothing can replace his warmth, sense of family, and generosity of spirit.

  
RAS YOSEFF MAKONNEN

Sworn to before me this  
5<sup>th</sup> day of April, 2022

  
Notary Public



KIMBERLY A. HOPPLE  
Commission # GG 326966  
Expires April 29, 2023  
Bonded Thru Budget Notary Services

**Gary Edison Mothersille**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF**  
**GARY EDISON MOTHERSILLE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA                    )  
  : SS.:  
COUNTY OF PALM BEACH            )

GARY EDISON MOTHERSILLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11616 Sally Ann Drive, Palm Beach Gardens, Florida, 33412.

2. I am currently 60 years old, having been born on March 14, 1962.

3. I am the brother of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Trevor passed away from penile cancer on September 4, 2017. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Trevor was my big brother and my father figure growing up. As a child, I looked up to him, and as I grew older we became very close. Trevor was someone I could lean on and talk to about anything. As I developed my landscaping business in Florida, I would often go to Trevor first for help in answering any business-related questions before making decisions. Trevor was one of my favorite people in the entire world.

6. I know Trevor worked in the financial district in New York City. He loved the business atmosphere. From personal conversations with Trevor, I know he was working in the financial district on September 11, 2001, and he continued to work in that area for some time after the attacks once he was told it was safe to return.

7. I learned of Trevor's illness when I was living in Florida. Trevor and his wife, Elaine, would come down to visit frequently and at every opportunity. On one visit, Trevor told me about his penile cancer. Elaine told me about the chemotherapy. He told me that things had improved, but a year later the cancer attacked him again. During his treatment, Trevor and Elaine traveled to Florida by train because it was too uncomfortable for him to fly. Elaine and I drove Trevor to Alabama for a special experimental treatment. For that trip, we rented a minivan, and he had to lay down in the back of the van for the whole trip because it was too painful for him to sit upright. Despite the experimental treatment and every effort to improve his condition, it didn't help.

8. When Trevor was ill and undergoing treatment, I did whatever I could do to help with his wheelchair and provide other medical equipment to help make him more comfortable. And, of course, assist him with medication and trips to Alabama for Trevor's experimental treatment. We all took a lot of time off to help him and get the best care possible to try to extend his life. Unfortunately, the cancer took him anyway.

9. Trevor's cancer and passing had a tremendous impact on me. I lost my mentor and my big brother, someone who I bounced ideas off of and loved. I loved his children and he loved mine. I say a daily prayer for Trevor because I love him and I miss him. Many of the things he taught me growing up are still with me. I attribute a lot of my success to my big brother.

  
GARY EDISON MOTHERSILLE

Sworn to before me this  
12<sup>th</sup> day of April, 2022

  
Notary Public

**Roma Mothersille**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
ROMA MOTHERSILLE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA                     )  
  : SS.:  
COUNTY OF PALM BEACH            )

ROMA MOTHERSILLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 4126 Community Drive, Jupiter, Florida, 33458.

2. I am currently 61 years old, having been born on January 28, 1961.

3. I am the sister of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother died from penile cancer on September 4, 2017 at the age of 63. It was determined by the World Trade Center Health Program that my brother's illness was causally connected to his exposure to the toxins in the air resulting from the September 11, 2001 terrorist attacks.

5. Trevor and I were always very close growing up. All the siblings were very close. We vacationed together as a big family. I visited Trevor and his wife, Elaine, quite often. While my home is in Florida, I work as a flight attendant based in Newark, New Jersey, which was nearby Trevor and Elaine, so I would stay with them in between my flights. Trevor and Elaine were married in Jamaica, and we took several trips there as a family. In addition, Trevor and



Elaine would visit us in Florida all the time and sometimes we would drive down to Key West. We are an active family and very sports-oriented. I remember most of the trips with Trevor involved some kind of sporting activity, whether we were vacationing inside or outside the country, or right here in South Florida.

6. Trevor worked on Wall Street and was in the vicinity of the World Trade Center on September 11, 2001 at the time of the terrorist attacks. In my opinion, Trevor's exposure was quite intense. Trevor did continue to work in the area until he was no longer physically able to do so.

7. I learned about Trevor's illness through Trevor's wife, Elaine. Before his diagnosis, she was worried because she saw symptoms that were just not normal. Finally, he went to the doctor and was diagnosed with penile cancer and Elaine called the family to let us know.

8. The loss of my brother is extremely impactful. I'm a glass half-full type of person, and I pray a lot. In the time following Trevor's diagnosis, I would say a prayer every day for his recovery and to ease his suffering. I think in some aspects I was probably in denial through a lot of his illness, even when it became more severe. I was in denial that my brother could possibly be taken from me. I was just praying up all the way through the end that he wouldn't be taken and that somehow, he would be made well so that he could continue life with his family, because losing him would be such a tremendous loss.

9. It's difficult to express just how painful it was for me during the period when Trevor was in his final days. On one occasion, during a family gathering to watch a prizefight at my younger brother Gary's house, there was some difficulty getting the fight on TV. After leaving for home, I decided instead to visit Trevor in the hospital. This was when he was just a few weeks away from going into hospice. When I arrived at the hospital, Trevor was sleeping and I sat in the chair in his hospital room the entire night. The next morning when he awoke, Elaine called him, he answered the phone, and I listened to his conversation. He told his wife that I had been there the entire night. I never knew, until that point, that he realized I was there in the hospital with him. I thought he was just sleeping and was unaware of my presence. But, he knew exactly when I arrived and that I had been sleeping in the chair the entire night. He felt my presence there and that's just a testament of the ties that we had as brother and sister.


Shortly thereafter, before Trevor was taken to hospice, I was at the hospital and he was on heavy medication and pretty out of it, but I was feeding him soup. Then, I asked him, "Do you know who I am?", and he said, "Of course I know who you are. You're Roma Mothersille, You're my sister." That was my brother.

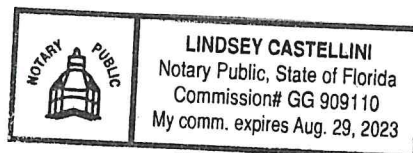
10. Since I work as a flight attendant based out of Newark, my brother Trevor would generally host me in his home in between my flights, which helped me save a significant amount on a yearly basis on local hotels each time I fly to New Jersey for work. And it was always comforting to spend time with Trevor and Elaine, even if it was only for a short period of time.

11. My brother suffered tremendously during his cancer. At the same time, I am inspired because he was a warrior and even through his suffering, he tried to make us feel as comfortable as he could. My brother suffered quite a bit and I miss him dearly. Every day I pray that he is somewhere, feeling no pain, looking down on his family, and keeping an eye out on us. The suffering and what the cancer did to his body was something I think no human should ever have to endure, and he was a trooper through all of it. Trevor tried to keep a stiff upper lip. He was a fighter and wanted us to believe that he was going to make it. I lived that time period in denial, not ever thinking that I would truly lose my brother, and it's devastating to know that he's not here as part of my life. But he will always be in my heart.

  
ROMA MOTHERSILLE

Sworn to before me this  
12 day of April, 2022

  
Notary Public





**Ena Louise Price**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
ENA LOUISE PRICE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA            )  
                                      : SS.:  
COUNTY OF PALM BEACH)

ENA LOUISE PRICE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6055 Winding Lake Drive, Jupiter, Florida, 33458.

2. I am currently 88 years old, having been born on October 9, 1933.

3. I am the mother of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My son passed away from penile cancer on September 4, 2017, at the age of 63. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Trevor was a wonderful son. Whenever he would visit me in Florida, we would exercise together and go for long walks. My son enjoyed picking the fruit in my yard and was always glad to help me dig in the garden and plant new flowerbeds. I really miss our walks together because we would spend a lot of time talking about life and how things are going with the family and my grandchildren. When Trevor and his family would visit, I was always overjoyed and was glad that we would prepare beautiful dinners and arrange picnics so we could all catch up and talk. I was always extremely proud to see Trevor with his children,

because it was clear he was a wonderful father. Trevor worked as a broker on Wall Street for many years. Naturally, as he was quite proficient in finance, my son would often help me with any questions related to finance. When Trevor was working, he would call me every morning before he left for work, just to say hello and check in to see how I was doing.

6. On September 11, 2001, Trevor worked in Manhattan's financial district. Since Trevor worked at One New York Plaza, only a few blocks away from the twin towers, on the day of the terrorist attacks, he was told to evacuate, and he tried to reunite with his wife in a safe place as soon as possible. Once the public was informed that it was safe to return, Trevor returned to work in the same location a few weeks later. Unfortunately, Trevor continued to work in that location, under the poor conditions that resulted from 9/11, for at least several months afterward.

7. I learned about Trevor's cancer diagnosis through his wife, Elaine. She informed me that there was an examination which confirmed the diagnosis. After receiving treatment in New York, Trevor came to stay with me in Florida, and I cared for him as best I could. I did everything I could to make him as comfortable as possible when he was here. As Trevor's cancer progressed, it was very difficult for him to walk more than a few steps. I know he was in severe pain and could not walk because his scrotum was so swollen. As a result of the extensive spreading of his cancer, Trevor was bleeding profusely and had to be moved to the hospital for a blood transfusion. When Trevor was with me in Florida, I would help keep track of his medications and would help administer his shots in the morning to relieve his pain.

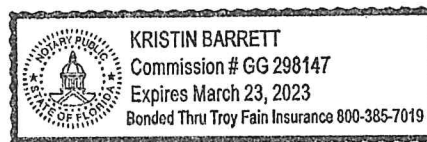
8. One of the hardest things about seeing my son suffer through his battle with cancer was seeing the loss of his independence. Trevor was such a proud man who did everything for his family; however, now he needed help for everything. This experience was extremely draining emotionally. As Trevor's mother, I had to show my son as much strength as possible and encourage him to keep going and fight as hard as he could. I remember clearly, sitting next to Trevor in his hospital bed, holding his hand firmly, and pleading with him not to give up. My son's death has drained me so much. Every time I want to understand something about life or need advice, for which I would have turned to Trevor, I feel his loss. Our family called Trevor the man of the hour because he was so brilliant and knowledgeable in so many different areas. I feel that my life is now adrift without the benefit of Trevor's wisdom.

9. I wish my son was here so much. With photographs of my son hanging all over the house, I pass his picture all the time and talk to him daily, saying "good morning, Trevor." While he's no longer here physically, I feel Trevor's presence spiritually. Trevor was exceptionally compassionate and was a man who adored his children and loved his family, his wife, and his mother very much. I miss him terribly.

Ena L. Price  
ENA LOUISE PRICE

Sworn to before me this  
14<sup>th</sup> day of June, 2022

[Signature] 6/14/2022  
Notary Public



**Adriana Coney-Miller**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF  
ADRIANA CONEY-MILLER**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF MIDDLESEX )

ADRIANA CONEY-MILLER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3302 Pine Valley Way, Piscataway, New Jersey, 08854.
2. I am currently 31 years old, having been born on March 1, 1991.
3. I am the daughter of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father died from penile cancer on September 4, 2017. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I was 26 years old when my dad died. I had a very close relationship with my father and was daddy's little girl. My dad loved the outdoors. He was very active and spent a lot of time hiking. He was also instrumental in my son's life and loved spending time with his grandson. As a family, I have fond memories of spending time with my dad swimming,



enjoying nature, sighting wildlife and traveling to different countries, including a number of trips to Jamaica and the Dominican Republic. Living in New Jersey, we enjoyed frequent trips to Liberty State Park and the Liberty Science Center.

6. At the time of the attacks on September 11, 2001, I was only 10 and a half years old; however, I always remember seeing my dad getting ready for work in the morning, including on 9/11. He worked in Manhattan's financial district and had to leave the office early after the planes struck the towers. In addition, my dad later explained that he went back to work in the financial district only a few weeks after the terrorist attacks.

7. After I graduated high school, I learned that my father had cancer. I could see my dad was uncomfortable for several years, but I wasn't informed about the full extent of his condition until the last year or two of his life, when he was undergoing chemotherapy as well as an experimental clinical trial.

8. Learning of my dad's cancer was exceptionally difficult, especially considering how close we were and because I was his only daughter. After my dad moved to Florida to make his cancer treatment more accessible, we would talk on the phone often and have lengthy conversations. However, as my father's health declined, he couldn't talk for as long as before, leaving me in tears many nights. One of the most difficult things for me emotionally was the sadness that comes with the reality that my father won't be able to see his grandson develop into a young man. My son had such a special relationship with his grandfather and felt so hurt by his death. At my father's funeral, my son, who was only three years old at the time, stood by the casket and reminded mourners attending my father's wake to "touch Trevor to say goodbye."

9. If there's anything that should be emphasized, it would be the absolute torture that my father endured during his affliction with penile cancer. I know my dad fought hard but he was clearly in agony. I'm proud of my dad; he worked hard on Wall Street his whole life to provide his family everything. My dad didn't deserve to suffer the way that he did. Before he

passed, I visited my dad in hospice and saw him grimacing in pain as the tumors rose out of his body. He looked like he had been mauled by a dog from the chest downward. It was horrifying and something I will never forget.

  
ADRIANA CONEY-MILLER

Sworn to before me this  
4<sup>th</sup> day of April, 2022

  
Notary Public



**Linda Morigi**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF**  
**LINDA MORIGI**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF ROCKLAND )

LINDA MORIGI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 45 Montebello Commons Drive, Suffern, New York, 10901.

2. I am currently 72 years old, having been born on October 27, 1949.

3. I am the wife of Paul Steven Morigi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On May 14, 2010, my husband Paul died from pulmonary fibrosis at the age of 60. It was medically determined that Paul's illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Paul was so deeply involved in my life, and we did so much together. Perhaps most importantly, we raised a beautiful son together. We enjoyed life tremendously, going on many trips, and staying active together, often playing golf or cross-country skiing. Paul's family had a villa in Italy, and we would go there to explore the countryside, see relatives, and enjoy authentic Italian cuisine. On some other memorable trips, we traveled to Jamaica, Aruba, and the islands of Turks and Caicos. On the trip to Jamaica in 2008, we did some off-roading with a Jeep

and saw lots of iguanas running around. We shared a good life.

6. On September 11, 2001, I remember being on the phone when Paul called from the exchange right after the plane hit. Paul told me that he ran down the street and people were hiding behind barricades because there was so much dust and debris. He found some people and took a ferry to New Jersey, where I later picked him up in Morristown. He was covered in dust, and I kept the suit he wore that day, placing it in a bag and storing it for years. After a couple of moves, and ultimately after Paul passed away, I decided to throw it out. Paul worked as a stock broker and continued to work on the American Stock Exchange for years after 9/11. Paul went to work in the heart of the financial district every day until 2009, and he described to me how awful the area around the World Trade Center was after the attack. I know he was quite devastated, returning to the area on a daily basis and being reminded of the terrorist attacks. Beginning his commute from our old home in Ramsey, New Jersey, Paul took the PATH train into the City every day. After they cleaned up the World Trade Center site, the PATH train terminated in the basement of the World Trade Center, so he would have to walk past the construction and the demolition work on a daily basis.

7. Shortly after 9/11, my husband had breathing issues and developed a bad, hacking cough. It was due to all the toxic dust in the air. There were still tons of particulates floating around, which took time to settle. I remember Paul said that he hated going through that area and walking to work because you could smell how terrible the air was, making his presence there a serious health risk. Before his illness, Paul and I enjoyed an active life together. For Paul, I feel sad that he was no longer able to do the things he enjoyed the most. After his breathing difficulties developed, even gardening became quite difficult and he had to garden in much more limited ways.


8. Paul passed away in his sleep. I was in total shock. Talking about his death is very emotional for me. It pains me to have to think about everything my husband went through, including all of those trips into the City, which made it so excruciating just to get to work. I haven't had him for a long time now, and I miss him terribly. Quite frankly, after 9/11, Paul was just not the same person that I knew before. As far as his pulmonary fibrosis, he suffered tremendously. Due to his breathing difficulties, Paul started going to a pulmonologist on July 28, 2004 and continued to see him until February 11, 2009. Paul had completed several chest high-

resolution tests and was going back and forth to a myriad of doctors. It was agonizing for him to cough constantly, interrupting every aspect of his life, from simple conversations, to work, to even a quiet rest.

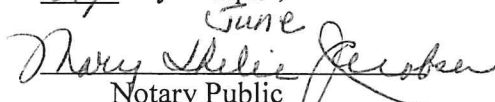
9. My husband's pulmonary fibrosis affected us financially, of course. He knew he was ill for some time. I don't think he even told us how bad it really was. For sure, Paul didn't say everything about all the doctors he went to see. At the time, I worked part-time at a frame shop for an hourly wage, and Paul was the primary breadwinner. Paul had to be more mobile on the trading floor, and doing that indoors with a lung issue was very challenging. I know he felt badly about this because he was getting paid higher as the senior person on the floor but wasn't able move the way he used to. With so much hacking, wheezing, and stopping to use his inhalers, the high-pressured work on the exchange was too much and he was let go in 2009. That was a very tough time for the whole family.

10. Watching someone you love suffer the way I watched Paul, it's the worst thing that ever could happen. I miss him because he meant the world to me. It's been hell going through life without him. He died way too young. It's just an awful thing that happened. For him to go back and forth everyday and breathe that in every day, I can't even imagine what he was going through.

State of New York  
County of Rockland

  
LINDA MORIGI

Sworn to before me this  
27 day of ~~April~~, 2022

June  
  
Notary Public

